

UNITED STATES DISTRICT COURT
for the
MIDDLE DISTRICT OF GEORGIA

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**U.S. DISTRICT COURT
COLUMBUS DIVISION**

SHEREEN R GREENE

‘Plaintiff’

v.

CASE NO _4:18-CV-199 (CDL)_

QUICKEN LOANS, Inc.

ROCKET MORTGAGE

AMROCK, Inc., fka “TITLE SOURCE, INC.”

MERS (Mortgage Electronic Registration Systems, Inc.

COOK & JAMES LLC

RUBIN LUBLIN LLC

ALL JOHN OR JANE DOES, Unknown Investors

**JOHN ROES, Undisclosed Mortgage Aggregators, Wholesalers, Mortgage Originators,
Loan Sellers, Trustees of Pooled Assets, Trustee for Holders of Certificates of Collateralized
Mortgage Obligations, Investment Bankers, Future Buyers and Investors, Individually,
Jointly and Severally**

also known as ‘Defendants’

OPPOSITION TO RUBIN LUBLIN’S MOTION TO STAY PRETRIAL DEADLINES and
CONCUR TO RUBIN LUBLIN’S MOTION TO DISMISS PLAINTIFF’S SECOND
AMENDED COMPLAINT

COMES NOW, Shereen R Greene, Plaintiff in the above-styled Civil Action, and hereby files this Opposition to Motion to Stay Pretrial Deadlines as set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court, pending a ruling on a Motion to Dismiss, et al. filed by RUBIN LUBLIN, LLC. As A Pro Se Plaintiff with no access to “citation of authorities,” due

to my inability to pay expensive subscription costs for legal citations, I oppose and concur on this Motion for the following reason(s), simplistic though they might be:

- (a) Plaintiff has reason to believe that Rubin Lublin, LLC may have already pre-foreclosed on the subject property, though he was requested in a letter dated some time during the month of August 2018 for a list of documents that their office has yet to return. They have also stated that they have no 'legal' obligation to send those documents prior to any foreclosure action, though he was told in no uncertain terms that a lien had not been perfected on the home due to a RESPA violation involving data manipulation tactics. Rubin Lublin stated that I "signed" documents and 'defaulted,' but does not mention the fact that Quicken Loans had a fiduciary duty to prepare the documents and its escrows in compliance with Federal law and in compliance with HUD guidelines and rules, especially those contained in HUD regulations outlined in the Civil Suit filed by the US Department of Justice, US Attorney's office, against Quicken Loans, US District Court, Eastern Michigan, Civil Action 15-0613, which action originated in US District Court, District of Columbia as a COMPLAINT FOR VIOLATIONS OF FALSE CLAIMS ACT, 31 USC 3729-3733 AND COMMON LAW: United States Complaint and Jury Demand, which document is hereby incorporated into said Defense for the COMMON LAW.
- (b) Plaintiff has reason to believe that Rubin Lublin, LLC may have Discovery documents in the office files of their offices that have to do with communications, whether they are emails, telephone calls, or letters or what have you, between their firm and Quicken Loans, Inc. and/or Rocket Mortgage, or all of the other parties to this Complaint that have to do with their intent to ignore my requests and follow through with a January 2019 foreclosure in spite of having never returned those documents nor responded to my August letter requesting a particular list of documents. I feel that there may be something in there that this office is trying to hide with regard to the particulars of their attempts to foreclose in the past. He has made the statement that I am employing "stall tactics," but I am, in fact, asserting that they have no right to foreclose without the proper discovery to find out and ascertain how and why this data regarding property taxes was manipulated to switch or swap out a prior owner's taxes at closing in exchange for my own – more than a

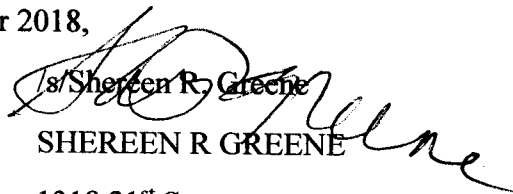
year later – especially considering that HUD requires Direct Endorsement Lenders (DELs) to review their files and report MATERIAL critical errors within 45 days and this also, did not happen.

- (c) The Federal Rules of Civil Procedure that I was able to look up with the only resources that I have access to allow that a Judge can deny a Motion to Dismiss or other Motions if there is any plausibility of concern even though full evidence and specific details are not available at the moment, but may come forward in a future discovery and trial date.
- (d) Plaintiff has clearly stated a claim upon which relief can be granted, but also acknowledges that if Rubin Lublin did not, as they state, complete the foreclosure sale or a pre-foreclosure sale of any kind or capacity, the Plaintiff has no current interest in pursuing a claim against Lublin until and unless evidence to the contrary is found during the Discovery process. If there is no actual claim against Lublin with regard to a foreclosure and/or pre-foreclosure sale, Plaintiff all the same does not release her right to sue Rubin Lublin, and/or any other entity that attempts to foreclose in a later or future Complaint that could potentially be filed in the event of a *wrongful foreclosure* prior to or after April 1, 2019.
- (e) For such other and further relief as this Court deems just and proper.

CONCLUSION

Based on the foregoing, Plaintiff respectfully concurs that Rubin Lublin's **Motion to Dismiss** be granted with exception to mandated release of any and all pre-trial discovery documents pertaining to the foreclosure or pre-foreclosure of the subject property that may or might be needed to substantiate the remaining matter at hand in this Civil Action.

Respectfully submitted, this 13th day of December 2018,


/s/ Sherreen R. Greene
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Psalm 10

¹ Why, LORD, do you stand far off? Why do you hide yourself in times of trouble?

² In his arrogance the wicked man hunts down the weak, who are caught in the schemes he devises.

³ He boasts about the cravings of his heart; he blesses the greedy and reviles the LORD.

⁴ In his pride the wicked man does not seek him; in all his thoughts there is no room for God.

⁵ His ways are always prosperous; your laws are rejected by him;
he sneers at all his enemies.

⁶ He says to himself, "Nothing will ever shake me." He swears, "No one will ever do me harm."

⁷ His mouth is full of lies and threats; trouble and evil are under his tongue.

⁸ He lies in wait near the villages; from ambush he murders the innocent.

His eyes watch in secret for his victims; like a lion in cover he lies in wait.

He lies in wait to catch the helpless; he catches the helpless and drags them off in his net.

¹⁰ His victims are crushed, they collapse; they fall under his strength.

¹¹ He says to himself, "God will never notice; he covers his face and never sees."

¹² Arise, LORD! Lift up your hand, O God.

Do not forget the helpless.

¹³ Why does the wicked man revile God?

Why does he say to himself, "He won't call me to account"?

¹⁴ But you, God, see the trouble of the afflicted; you consider their grief and take it in hand.

The victims commit themselves to you; you are the helper of the fatherless.

¹⁵ Break the arm of the wicked man; call the evildoer to account for his wickedness
that would not otherwise be found out.

¹⁶ The LORD is King for ever and ever;
the nations will perish from his land.

¹⁷ You, LORD, hear the desire of the afflicted;
you encourage them, and you listen to their cry,

¹⁸ defending the fatherless and the oppressed,
so that mere earthly mortals will never again strike terror.

CERTIFICATE OF SERVICE

I hereby certify that I have, this 13th day of December, 2018, served the within and the foregoing by placing a true and correct copy of the same in the United States Mail, with first-classed postage affixed thereto, properly addressed as follows”

RUBLIN LUBLIN LLC

Attorneys and Counselors at Law

3145 Avalon Ridge Place, Ste 100

Peachtree Corners GA 30071

678 281 2730

THOMAS F CRISTINA

PO Box 1199

Columbus, GA 31902

A handwritten signature in black ink, appearing to read 'Shereen R. Greene', is written over a printed name. The signature is fluid and cursive.

SHEREEN R. GREENE